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June 30, 2015

Honorable Judge Leda D. Wettre, U.S.M.J.

Martin Luther King Building

& U.S. Courthouse

50 Walnut Street

Newark, NJ 07101

Via ECF Only

Re: Rahami v. City of Elizabeth, et al.  
Case No. 2:11-cv-01953 KM/LDW

Your Honor:

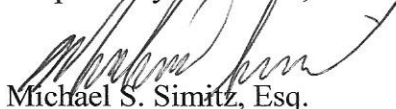
This office represents Defendant Vito Tropeano. As per your Honor's June 24, 2015 Order, please accept this letter as a status update on the case.

The matter remains stayed pending the Order of this Court given the *Heck* issue which bars the Plaintiffs' causes of action. Though Plaintiffs' criminal appeal of the convictions was denied by the Superior Court of New Jersey, Appellate Division, the Plaintiffs filed a Petition for Post-Conviction Relief on or about July 8, 2014, to withdraw the guilty plea entered in Elizabeth Municipal Court. As a result of this filing, this Court continued the stay.

Subsequent, Plaintiffs' counsel, Shelly Stangler, Esq., successfully withdrew as counsel and Plaintiffs now appear *pro se*. The status of Plaintiffs' Petition for Post-Conviction Relief is unknown and no update has been provided by Plaintiffs.

On behalf of Defendant Tropeano, this office respectfully request the matter not be reopened.

Respectfully submitted,



Michael S. Simitz, Esq.

cc: Mohammad K. Rahami, Jr.  
Mohammad Q. Rahami

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